

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF OHIO, CLEVELAND DIVISION**

NANCY SMITH,)	Case No. 1:24-cv-00344
)	
Plaintiff,)	
)	HON. DAVID A. RUIZ
v.)	
)	
CITY OF LORAIN, et al.)	MAG. JUDGE JENNIFER DOWDELL
)	ARMSTRONG
Defendants.)	
)	
)	JURY TRIAL DEMANDED
)	

**PLAINTIFFS' UNOPPOSED MOTION FOR AN EXTENSION TO FILE
RESPONSE TO DEFENDANTS' MOTION TO DISMISS**

NOW COMES the Plaintiff, NANCY SMITH, by and through her counsel, LOEVY & LOEVY, and respectfully moves this Court for an extension of her response to Defendants' City of Lorain, Joel Miller, Russ Cambarare, Estate of Cel Rivera, Pete Rewak, and Mark Carpentiere Motion to Dismiss deadline in the above-captioned case. As grounds, Plaintiff state's the following:

1. On May 20, 2024, Defendants filed their Motion to Dismiss. (Dkt. 26).
2. Plaintiff's response is currently due June 19, 2024.
3. Counsel for Plaintiff currently has briefing deadlines in the next several weeks. The matters in which counsel has upcoming briefs due include: *Mack Sims v. Charles Wicks*, (23-cv-3201, 7th Cir.), *Carlos Jaile v. City of El Paso et al.*, (24-cv-2339, N.D. Ill.), and *Royer v. Chapman et al.*, (22-cv-254, N.D. Ind.).

4. Counsel also has depositions upcoming in the matter of *Yell v. City of Rusesllville, et al.*, (20-cv-47, W.D. Ky.), which will prevent counsel from providing a fulsome response to Defendants' motion to dismiss.

5. Counsel for Plaintiff has reached out to Defendants' Counsel, and Defendants do not object to this extension request.

6. For the foregoing reasons, Plaintiff respectfully requests this Court grant her an additional 21-day extension until July 10, 2024 to file her response.

RESPECTFULLY SUBMITTED,

/s/ Elliot Slosar

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CERTIFICATE OF SERVICE

I, Elliot Slosar, an attorney, hereby certify that on June 17, 2024, I delivered by electronic means a copy of the foregoing motion to all counsel of record and served a copy via U.S. Mail to the following:

Margaret Grondin
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/s/ Elliot Slosar
Attorneys for Plaintiffs